

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

Crop Production Services, Inc.,

Plaintiff,

vs.

Justice Family Farms, LLC,

Defendant.

COMPLAINT
(Non-jury)
Debt Collection

Civil Case No.: 3:13-cv-01534-JFA

The Plaintiff, Crop Production Services, Inc., complaining of the Defendant, Justice Family Farms, LLC, would respectfully show that:

1. The Plaintiff is a Delaware corporation with its principal place of business in Colorado and authorized to do business in South Carolina.
2. The Defendant, Justice Family Farms, LLC, is a limited liability company organized under the laws of West Virginia and doing business in South Carolina.
3. A substantial part of the events giving rise to this claim occurred in Sumter County, SC, and the Defendant regularly does business in Sumter County, SC.
4. The amount in controversy is greater than the sum or value of \$75,000 exclusive of interest and costs.
5. In 2012 and 2013, the Plaintiff agreed to sell various goods and services to the Defendant, and the Defendant agreed to pay for those goods and services pursuant to terms set forth on the Plaintiff's invoices provided with each sale of goods and/or services. A typical invoice for goods and/or services is attached and incorporated herein as Exhibit A. The parties agreed, however, that despite what the invoices said, payment was due on or before the 60th

day after the invoice date. Any amounts not paid by the 60th day after the invoice date would be subject to a finance charge on the unpaid balance at the rate of 1.5% per month.

7. The Plaintiff did deliver to the Defendant agricultural chemicals, supplies and other goods and did provide services to the Defendant. The amounts due for the transactions are set out in the itemized statement of account attached hereto and incorporated herein by reference as Exhibit B.

8. No payments have been made on the account except as are shown on Exhibit B, and although due demand for payment has been made, the Defendant has neglected and failed to pay the same.

9. There is due and owing to the Plaintiff by the Defendant the sum of One Hundred Fifty-six Thousand Thirty-nine and 26/100 (\$156,039.26) Dollars as of May 31, 2013, with prejudgment and post-judgment interest accruing on this liquidated amount at the rate of 18% per annum plus costs.

WHEREFORE, the Plaintiff prays for judgment against the Defendant in the amount of One Hundred Fifty-six Thousand Thirty-nine and 26/100 (\$156,039.26) Dollars as of May 31, 2013 plus prejudgment and post-judgment interest at 18% per annum and such other and further relief as is just and proper.

/s/ Robert P. Wood

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